

# **Exhibit A**

**Exhibit A**

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14 Attorneys for Plaintiff and Counter-defendants

15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**  
17 **SOUTHERN DIVISION**

18 SOFTKETEERS, INC. a California  
19 corporation,

20 Plaintiff,

21 v.

22 REGAL WEST CORPORATION d/b/a  
23 REGAL LOGISTICS, a Washington  
24 corporation; VU HO INC., THAI  
25 TRAN INC., and DON MAI INC.,  
26 California corporations; and RAND  
27 NEEVES, VU HO, THAI QUOC  
28 TRAN, DON MAI, TRUNG NGOC  
DOAN, AND DONG BAO PHAM  
individuals,

Defendants.

Case No. 8:19-cv-00519-JVS (JDEx)

**ORDER GRANTING STIPULATED  
MOTION FOR ALTERED SOURCE  
CODE REVIEW PROCEDURES IN  
LIGHT OF U.S. PANDEMIC RESPONSE**

HON. JAMES V. SELNA  
UNITED STATES DISTRICT JUDGE  
SANTA ANA, COURTROOM 10C

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AND RELATED COUNTERCLAIMS.

1 Having considered the parties' Stipulated Motion for Altered Source Code Review  
2 Procedures in Light of U.S. Pandemic Response, the Court finds that good cause exists to  
3 grant the stipulated motion. Therefore, the Motion is hereby GRANTED, and the Court  
4 modifies Section 10 of the Protective Order to permit the parties to make source code  
5 available according to the following conditions:


- 6 1. Promptly upon confirmation of the Court's approval of these procedures, the  
7 parties will provide the source code that they have produced in this matter on a  
8 laptop shipped directly to the opposing parties' source code expert, which will  
9 be designated HIGHLY CONFIDENTIAL – SOURCE CODE under the  
10 Protective Order.
- 11 2. The parties will further arrange with Integrity Legal Corp. for the source code  
12 that has been held in escrow to be delivered by electronic means to both source  
13 code experts for download to such laptops.
- 14 3. The parties' experts may use whatever tools they believe necessary for their  
15 review of the source code.
- 16 4. The parties' experts will be permitted to connect the provided laptops to the  
17 Internet for the limited purpose of installing and activating review tools used for  
18 the source code review, as well as for the receipt of additional source code from  
19 the Producing Party or as per Paragraph 2. The experts agree not to transmit the  
20 opposing parties' produced source code over the Internet or other network  
21 connections.
- 22 5. The parties' experts shall not print, photograph, copy, remove or otherwise  
23 transfer any portion of the source code onto any recordable media or recordable  
24 device. The parties and their experts may request paper copies of limited  
25 portions of source code, in accordance with Section 10(c) of the Protective  
26 Order. Under Section 10(c) of the Protective Order the Producing Party will  
27 send by overnight courier the paper copies requested by the Requesting Party  
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1 and its expert within 2 business days of return of the laptop to the Producing  
2 Party.

- 3 6. The parties' experts will return the laptops to the producing parties upon  
4 completion of their review and are permitted to take steps to delete or purge  
5 evidence of their protected work product from the laptops before returning  
6 them. This stipulation does not alter the disclosure requirements under the  
7 Federal Rules of Civil Procedure for the Disclosure of Expert Testimony.  
8 7. The parties' experts will sign this stipulation indicating that they have read it  
9 and agree to be bound by its terms and the terms of the Protective Order.

10 **The Court thanks the parties for working cooperatively in these difficult**  
11 **times. JVS**

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14 Dated this 9th day of April, 2020

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16 HON. JAMES V. SELNA  
17 United States District Court Judge  
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